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September 12, 2023

BY ECF

Honorable Joanna Seybert
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Lett, Case No. 18-CR-261 (JS)

Dear Judge Seybert:

We represent Mr. Philip Lett in the above-referenced matter. Mr. Lett is currently under the supervision of US Pre-Trial Services. We write today requesting the Court's permission for Mr. Lett and his common-law partner, Diane Marcil, to travel to France later this month. We have spoken about this request with Mr. Lett's Pre-Trial Services Case Manager, Officer Robert Stehle, who stated he does not object to this request. We also spoke with the DOJ prosecutor handling this matter, Josh Burke, who stated he does not object to this request.

As Your Honor is aware, this Court placed Mr. Lett under Pre-Trial Supervision in June of 2018, following Mr. Lett's acceptance of responsibility in this matter via a guilty plea. Since then, for the last five plus years, Mr. Lett has remained wholly compliant with all requirements of his Supervision. In addition, Mr. Lett was fully responsive to all government requests in connection with the trial in *United States v. Runner*, which concluded in June of this year. Mr. Lett was also given permission to travel internationally last year, and he returned to his home in Montreal without incident. Previously, the late Judge Spatt also approved travel requests for Mr. Lett, with which Mr. Lett adhered fully.

Mr. Lett and Ms. Marcil would greatly appreciate the opportunity to spend time with their close friends in France. Therefore, with this Court's permission, Mr. Lett would travel via plane from Montreal, Canada to Bagnols-et-Forêt, France, from September 26 to October 16.¹ Mr. Lett would be fully available by phone, email and video conference should anyone need to reach him. Upon returning to Canada, Mr. Lett would promptly return his passport and any other required documentation to Officer Stehle.

¹ These dates are of course subject to and dependent on the Court's approval. Upon approval of this request by the Court, Mr. Lett will submit to Pre-Trial Services a detailed travel itinerary, as well as proof of round-trip tickets for the agreed-upon dates.

Mr. Lett fully acknowledges, as does his counsel, that for this request to be granted, the Court would again have to place significant trust in Mr. Lett's promise to return at the culmination of the trip. We hope that in considering this travel request, the Court recalls Mr. Lett's strict adherence to the Court's and Pre-Trial Service's requirements and expectations related thereto for the past five plus years, as well as his ongoing contact and responsiveness with the government before and after his testimony in the *United States v. Runner* trial.

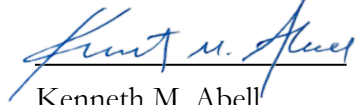
As mentioned above, Mr. Lett's Pre-Trial Services Case Manager, Officer Robert Stehle, stated he does not object to this request, and DOJ Trial Attorney Josh Burke similarly stated he does not object to this request. For all of the foregoing reasons, we respectfully request that Your Honor grant Mr. Lett permission to travel to France.

We thank the Court for its consideration of this request.

Respectfully submitted,

Abell Eskew Landau LLP

By:

A handwritten signature in blue ink, appearing to read "Kenneth M. Abell", is written over a horizontal line.

Kenneth M. Abell

Counsel for Defendant Philip Lett